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July 20, 2012

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 20554

Re: *Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197; *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Dear Ms. Dortch:

On Thursday, July 19, 2012, John Nakahata and Kasey Chow, on behalf of Talk N Text Wireless, LLC ("TNT"), as well as David Martin, Secretary of TNT spoke with Kimberly Scardino, and Divya Shenoy of the Telecommunications Access Policy Division. We discussed TNT's Compliance Plan as originally filed on June 26, 2012.

John Nakahata gave a brief introduction and overview of the Company. David Martin elaborated on the Company, its current and anticipated financial resources and financial capability to provide Lifeline service, its technical capability and key management experience, its proposed Lifeline plans, and its enrollment procedures.

We discussed TNT's partnerships with other companies to provide quality phones and distribution as well as anticipated other sources of revenue. We also discussed TNT's event marketing strategy and field enrollment procedures. Finally, TNT agreed to file a revised Compliance Plan with all suggested changes and additions.

Attached is a copy of the presentation deck that was provided at the meeting yesterday; copies of the updated sample brochure and certification forms will be filed with the Company's Revised Compliance Plan. Please contact me if you have any questions. Thank you.

Respectfully submitted,

/s/ KASEY CHOW

Kasey C. Chow, Associate to Lance J.M. Steinhart
Attorney for Talk N Text Wireless, LLC

Attachments

cc: David Martin
John Nakahata
Kimberly Scardino
Divya Shenoy



Talk N Text Wireless, LLC

Federal Communications Commission

July 19, 2012

- Introduction to Talk N Text Wireless, LLC
- Financial Capability
- Technical Capability
- TNT Wireless' Lifeline Plans
- Marketing / Advertising Plan
- Enrolling Lifeline Customers
- Recertifying Lifeline Customers
- Preventing Waste, Fraud & Abuse
- Q & A

Agenda

- Names and Identifiers used by Talk N Text Wireless, LLC:
 - Talk N Text Wireless
 - Talk N Text
 - TNT Wireless

Talk N Text Wireless, LLC



- In compliance with newly amended section 54.202, TNT Wireless certifies:
 - It will comply with the service requirements applicable to the support that it receives;
 - It has the ability to remain functional in emergency situations;
 - It will satisfy applicable consumer protection and service quality standards; and
 - It is financially and technically capable of providing the Lifeline service.

Talk N Text Wireless, LLC



- TNT Wireless is financially capable of providing the supported Lifeline service:
 - Financial Resources
 - Affiliates
- TNT Wireless plans to simultaneously launch both Lifeline and non-Lifeline wireless services after FCC Compliance Plan approval and receipt of ETC designations

Financial Capability

- TNT Wireless is technically capable of providing the supported Lifeline service :
 - Key Management Experience
 - **Bassam Abdallah:** 15+ yrs in telecom business/management
 - **Eric Fein:** 30+ yrs in business/legal; 3 yrs telecom
 - **David Martin:** 10+ yrs in telecom business/operations
 - **Bryan Bulloch:** 15+ yrs in business/finance

Technical Capability

- TNT Wireless proposes a choice between three (3) Lifeline plans:
 - Unlimited Monthly Minutes
 - 150 Monthly Minutes
 - 100 Monthly Minutes
- All plans include:
 - Free handset
 - Free calls to 911 Emergency Services
 - Free calls to Customer Service
 - Free Voicemail, Caller ID, and Call Waiting
 - Free Domestic Long Distance

TNT Wireless' Lifeline Plans



Unlimited

- Unlimited Anytime Minutes
- Discounted off Company's Retail Unlimited Plan
- Pre-Paid
- Minutes DO NOT Rollover
- 1 text = 1 minute

150 Minutes

- 150 Anytime Minutes
- Discounted off of Company's Retail 150 Minute Plan
- Post-Paid
- Minutes DO NOT Rollover
- 1 text = 1 minute

100 Minutes

- 100 Anytime Minutes
- FREE
- Minutes DO NOT Rollover
- 3 texts = 1 minute

TNT Wireless' Lifeline Plans

- Public Safety and 911 / E911 Access:
 - TNT Wireless will ensure that all handsets used in connection with its Lifeline service are E911-compliant.
 - TNT Wireless will provide its Lifeline customers with access to 911 and E911 services:
 - through its underlying carrier, Sprint
 - at the time of Lifeline service initiation
 - regardless of activation status and minute availability

TNT Wireless' Lifeline Plans



- All materials will comply with disclosure requirements:
 - Disclose company name under which it does business;
 - Explain in clear, easily understood language the following:
 - ✓ Only eligible consumer may enroll in the program;
 - ✓ What documentation is necessary for enrollment;
 - ✓ The program is limited to one benefit per household, consisting of either wireline or wireless service;
 - ✓ Lifeline is a government benefit program; and
 - ✓ Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.

Marketing / Advertising Plan

- TNT Wireless intends to market its Lifeline service via:

- Community Events
- TV / Radio spots
- Direct mail
- Flyers / Brochures

PACKAGES AVAILABLE:

Retail Unlimited (Pre-Paid) w/ Free Phone:	\$45.00
Retail 150 Minute (Post-Paid) w/ Free Phone:	\$15.00
Retail 100 Minute (Pre-Paid) w/ Free Phone:	\$9.25
Lifeline Unlimited (Pre-Paid) w/ Free Phone:	\$35.75
Lifeline 150 Minute (Post-Paid) w/ Free Phone:	\$5.75
Lifeline Free 100 Minute w/ Free Phone:	FREE

ADDITIONAL MINUTES AVAILABLE:

\$5.00 = 35 minutes
\$10.00 = 75 minutes
\$20.00 = 160 minutes



**TNT
WIRELESS LIFELINE
PROGRAM**

TNT Wireless
Talk N Text Wireless

Talk N Text Wireless, LLC
705 Commerce Street, Southlake, TX 76092
855.3.FREE.TNT
www.talkntext.net

Marketing / Advertising Plan

- Eligibility Confirmation:


1. Confirm prospect's identity (see government issued picture ID)
2. Confirm program or income eligibility (see proof)
3. Confirm valid household address and whether permanent/temporary or multi-household (validate w/USPS)
4. Confirm prospect not currently receiving subsidy (ask prospect, perform duplicate check into an internal and pooled external database)
5. Confirm that eligible party has received the handset and has used it prior to seeking reimbursement

Enrolling Lifeline Customers

- End-User Education and Disclosures:
 - Lifeline is a federal non-transferable benefit
 - Lifeline service is available for only one line per household
 - A household is defined, for Lifeline Program purposes, as any individual or group of individuals who live together at the same address and share income and expenses
 - Households are NOT permitted to receive benefits from multiple providers
 - Violation of the one per household limitation constitutes violation of the FCC's rules and will result in de-enrollment from the program, and potentially prosecution by the U.S. Government

Enrolling Lifeline Customers

- End User Attestations:
- See Certification Form



TNT WIRELESS ALABAMA LIFELINE
When completed mail to:
TNT Wireless
705 Commerce St, Southlake, TX 76092
Customer Service: 1.855.3.FREE.TNT
Fax: 479.291.4662

IF MAILED IN, YOU MUST SEND PROOF OF ELIGIBILITY WITH APPLICATION

I certify, under penalty of perjury: (Initial by Each Certification)

16 _____ The information contained in my application remains true and correct to the best of my knowledge and I acknowledge that willfully providing false or fraudulent information to receive Lifeline benefits is punishable by law and may result in me being barred from the program.

17 _____ I am a current recipient of the program checked above, or have an annual household income at or below 135 percent of the Federal Poverty Guidelines.

18 _____ I have provided documentation of eligibility if required to do so.

This signed Authorization is required in order to enroll you in the Lifeline Program in your state. This authorization is only for the purpose of verifying your participation in these programs and will not be used for any purpose other than for the Lifeline program. Service requests will not be processed until this form has been received and verified by Company. I authorize the company to access any records required to verify my statements on this form and to confirm my eligibility for the Lifeline program.

Things to know about the Lifeline Program:

- (1) Lifeline is a federal benefit.
- (2) Lifeline Service is available for only one line per household. A household cannot receive benefits from multiple providers; and
- (3) A household is defined, for purposes of the Lifeline Program, as any individual or group of individuals who live together at the same address and share income and expenses.

1 _____ I hereby certify that I participate in at least one of the following programs: (Check all that apply)

Initial Here _____

☐ Supplemental Nutrition Assistance Program (SNAP)
☐ Low-Income Home Energy Assistance Program (LHEAP)
☐ Supplemental Security Income (SSI)
☐ Temporary Assistance for Needy Families (TANF)
☐ National School Lunch Program
☐ Federal Public Housing Assistance
☐ Medicaid

_____ I certify that my household income is at or below 135% of the Federal Poverty Guidelines (FPG).
 Initial Here _____ There are _____ individuals in my household.

Important! The form should be completed IN CAPITAL LETTERS using a Black or DARK BLUE ballpoint/fountain pen. Characters and marks used should be similar in style to the following:

✓ X A B C D E F G H I J K L M N O P Q R S T U V W X Y Z 1 2 3 4 5 6 7 8 9 0

Applicant Information:

2 First Name _____ 3 MI _____ 4 Last Name _____

5 Residing Street Number _____ 6 Residing Address (No P.O. Boxes, Must be your principal address): _____ 7 Apt./Floor/Other _____

8 This Address is: ☐ Permanent ☐ Temporary ☐ Multi-household ☐ 10 State _____ 11 Zip code _____

9 Residing City _____

12 Billing Street Number _____ 13 Billing Address (May contain a P.O. Box) _____ 14 Apt./Floor/Other _____

15 Billing City _____ 16 State _____ 17 Zip code _____

18 Contact Telephone Number (including Area Code) _____ 19 Date of Birth (MM-DD-YYYY) _____ 20 Last 4 Digit of SSN _____

PLACE LABEL HERE

ESN: _____

MDN: _____

Lunch Program Housing Assistance

Enrolling Lifeline Customers

- Annual Recertification Compliance:
 - TNT Wireless commits to re-certify the eligibility of all Lifeline customers and report the results to USAC. Because it has not launched, TNT Wireless has no customers as of June 1, 2012.
 - TNT Wireless will continue to re-certify all active Lifeline customers by the annual anniversary of their enrollment.
 - All customers who fail to respond to the annual certification request within 30 days will be given additional notice that they have 30 more days to respond. If there is still no response, they will be de-enrolled from the Lifeline program.
 - In addition, TNT Wireless will continue to follow any state-specific requirements.

Recertifying Lifeline Customers

- TNT Wireless utilizes a diligent Enrollment Process
- TNT Wireless' business model primarily employs direct, in-store or over the phone/internet, high quality contact and customer service
- TNT Wireless will not seek reimbursement until a customer has personally activated service (by initiation and/or usage)
- TNT Wireless has a 60-day non-usage policy
- TNT Wireless emphasizes compliance in all aspects of the Lifeline program – marketing, enrollment procedures, representative training, process documentation, non-usage/de-enrollment procedures

Preventing Waste, Fraud & Abuse

- Additional Measures to prevent waste, fraud & abuse:
- Duplicates Database
 - Pooled External Database (CGM, LLC)
 - National Database, when in place
- Provide customer data to PUCs, FCC, and USAC
- Independent Biennial Audits*
 - *if TNT Wireless draws \$5 million+ on an annual basis

Preventing Waste, Fraud & Abuse

QUESTIONS?

